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*Counsel for Plaintiffs Teamsters-Employers
Local 945 Pension Fund and Trustees of
Teamsters-Employers Local 945 Pension Fund*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

-----X	
TEAMSTERS-EMPLOYERS LOCAL 945	:
PENSION FUND	:
	:
and	:
	:
TRUSTEES OF TEAMSTERS-EMPLOYERS	:
LOCAL 945 PENSION FUND	:
	:
Plaintiffs,	:
	:
vs.	:
	:
WASTE MANAGEMENT OF	:
NEW JERSEY, INC.	:
	:
Defendant.	:
-----X	

Case No. 2:11-CV-
00902 FSH-PS

**PLAINTIFFS' NOTICE
OF CROSS-MOTION
FOR A STAY OF THE
ARBITRATION**

**To: Frank A. Custode
Susan Katz Hoffman
Deidre A. Grossman
LITTLER MENDELSON
A Professional Corporation
One Newark Center - 8th Floor
Newark, New Jersey 07102
Attorneys for Defendant**

PLEASE TAKE NOTICE that on April 18, 2011, or as soon thereafter as counsel may be heard, the undersigned attorneys for Plaintiffs, Teamsters-Employers Local 945 Pension Fund and Trustees of Teamsters-Employers Local 945 Pension Fund, will cross-move before the Honorable Faith S. Hochberg, U.S.D.J., located at the United States District Court for the District of New Jersey, M.L. King, Jr. Federal Building & Courthouse, Newark, New Jersey, for an Order granting Plaintiffs' Cross-Motion for a Stay of the Arbitration and denying Defendant's Motion to Dismiss Pursuant to Fed. R. Civ. P. 12(b)(6).

PLEASE TAKE FURTHER NOTICE that in support of the within cross-motion, the undersigned attorneys for Plaintiffs will rely on its memorandum of law and Declaration of Jaimie C. Davis, Esq.

A proposed form of Order is submitted herewith.

Dated: April 4, 2011

CARELLA, BYRNE, CECCHI, OLSTEIN,
BRODY & AGNELLO, P.C.

By: /s/ Melissa E. Flax

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Employers Local 945 Pension Fund and
Trustees of Teamsters-Employers Local 945
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